

Exhibit O

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, SETH WISPELWEY,)
MARISSA BLAIR, TYLER MAGILL, APRIL)
MUNIZ, HANNAH PEARCE, MARCUS MARTIN,)
NATALIE ROMERO, CHELSEA ALVARADO,)
AND JOHN DOE,)
Plaintiffs)
VS.) CIVIL ACTION
NO. 3:17-cv-00072-NKM
JASON KESSLER, ET AL.,)
Defendants)

VIDEOTAPED ORAL DEPOSITION OF
THOMAS RYAN ROUSSEAU
OCTOBER 16, 2019

JOB #169672

1 THOMAS RYAN ROUSSEAU

2 Q. So you took silence as no, agreed?

3 A. I do not remember the specifics of the
4 conversations, but I do remember that I never received any
5 information whatsoever that suggests that he was a member
6 or affiliated with the organization, or had any prior
7 contact with the organization, other than being in the
8 same geographic area at the same general time.

9 Q. You understand that Mr. Fields is from Ohio,
10 right?

11 A. Yes.

12 Q. Who was in charge of Ohio -- who at Vanguard
13 America was in charge of Ohio?

14 A. One of the other vice people.

15 Q. Who?

16 A. I don't remember his name.

17 Q. Did he ever respond to your Discord post as to
18 whether Fields was a member?

19 A. I don't remember. I don't know if there was a
20 specific conversation like that, but I have never received
21 any information whatsoever which suggests that he was
22 affiliated with the organization in any way; other than
23 simply by the fact that he was there.

24 In the years since, I have never seen a
25 single thing, I have never received a single piece of

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2 Cville Vanguard server?

3 A. Yes, that makes sense.

4 Q. Okay. Are there any other servers designated
5 for the Charlottesville rally, that you can remember?

6 A. Remember specifically, no.

7 Q. Okay. Do you remember communicating to members
8 that there would be a dress code for Vanguard members?

9 A. I remember communicating that.

10 Q. And the -- the dress code was a white polo and
11 khaki pants, right?

12 A. Yes. But that had also been popularized -- if
13 you remember the 1.0 rally that you mentioned previously,
14 that was also the dress code for that one. But there were
15 lots of different organizations there and everyone
16 followed the same thing. So it was just kind of us going
17 along with a larger trend.

18 Q. Can we go back just so we're clear on the
19 record.

20 The dress code for members for the
21 Charlottesville rally in August was a white polo and khaki
22 pants?

23 A. Yes, but it was not exclusive to members.
24 Others were also following that dress code outside the
25 organization.

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2 (Exhibit 98 marked.)

3 Q. (BY MR. SIEGEL) I'm showing you a document
4 that's been marked as Exhibit 98.

5 A. Yep, 98.

6 Q. This is a photograph of you and several other
7 people at Charlottesville on August 11th and 12th, agreed?

8 A. Yes.

9 Q. Okay. And that's you on the far left?

10 A. Yes, that's me.

11 Q. Okay. Do you know the identity of the person
12 standing next to you on the -- to -- to the right, in the
13 photograph?

14 A. The one in the hat?

15 Q. Yeah, the hat and the sunglasses.

16 A. It would have been someone I traveled with.
17 It's not the best image. I'm not sure immediately.

18 Q. Was he a Vanguard member?

19 A. Well, he had his shirt on, so, yeah, he must
20 have been, and the hat.

21 Q. But you don't remember his real name?

22 A. Not off the top of my head. Not by appearance,
23 no.

24 Q. Do you remember his user name on Discord?

25 A. No, those would go hand in hand.

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2 Q. If you keep traveling right on the -- on the
3 photograph, do you understand that's James Fields?

4 A. Yes. But, again, according to the crowd that
5 existed at this point in time, people were coming and
6 going. There was no -- there was no organization to the
7 crowd or who was standing where.

8 And, you know, you can see he's not wearing
9 one of the shirts with the -- with the -- the embroidery
10 on it. There were any number of various groups and people
11 in -- in this photo alone, you know, who could have been a
12 part of anything.

13 Q. You'd agree with me that the people in the
14 foreground of this photo are wearing white polos?

15 A. With -- with the embroidery on it, yes, which
16 were purchased for the event. But I -- I can tell you
17 that not everyone wearing a white polo in Charlottesville
18 was a member of Vanguard America. At least -- I mean,
19 many people who were unaffiliated, not a part of any
20 group, wore that because that's what was worn at the
21 previous one. And I think the Identity of Evropa also had
22 that dress code.

23 THE REPORTER: Can you spell that?

24 THE WITNESS: E-V-R-O-P-A.

25 (Exhibit 87 marked.)

THOMAS RYAN ROUSSEAU

Q. Okay. So you wanted to make sure that if people did try and come after Vanguard, or any of the members that legally you guys were okay?

A. I wouldn't go that far. I just -- I just wanted more information. I just wanted to know what the heck was going on.

Q. Did you think you might be a witness?

A. I don't think I did, because I -- again, I found out about the accident or the non-accident depending on whatever -- I found out about the vehicular incident, is what we are calling it, at the same time as everyone else. I found out about it the same time as you-all did with, like, the -- the Twitter trending tab and the news stories and Huffington Post and -- and so on.

I was -- I was out -- I was on the outskirts of Charlottesville before I even heard about -- a car accident is how I think I first heard -- heard about it. I -- I knew and I still know I didn't see it happen. I didn't -- you know, I didn't -- I have no recollection of saying a single word to Fields in my 20 years of life, you know. I don't think it makes sense for me to be a witness. I didn't see it. I -- I've seen everything that you-all have, right, on -- on the news, you know --

Q. Right.